

August 7, 2024

Michael Barber General Counsel Green Mountain Care Board

Re: 2025 Vermont Exchange Rate Filing - Individual

SERFF Tracking #: MVPH-134081032

2025 Vermont Exchange Rate Filing – Small Group

SERFF Tracking #: MVPH-134081005

Dear Mr. Barber:

This letter is in response to your correspondence received 07/26/24 and 07/30/24 regarding the above-mentioned rate filings. The responses to your questions are provided below.

- 1. For MVP's 10 most common mental health CPT codes:
- a. Provide MVP's reimbursement for mental health visits in VT and bordering locations.
- b. Provide a comparison of MVP's reimbursement to other payers' reimbursement in VT and bordering locations. Provide the source of the information used for the comparison.

Response: Please see the table below with MVP's reimbursement for mental health visits in Vermont as compared to other payer's reimbursement. The 10 most common mental health CPT codes were identified by the highest total allowed dollars, which were sourced from our system claims. MVP increased many of its behavioral health fee schedules for its commercial population in New York effective 5/1/24, which is not reflected in this analysis.

	Allowed	Units	Allowed / Unit		
Commercial NY	\$17,420,511	249,110	\$69.93		
Commercial VT	\$4,840,556	49,149	\$98.49		
Medicare	\$2,707,605	28,286	\$95.72		
Medicaid	\$54,009,870	626,359	\$86.23		

10. Provide a breakdown of each Vermont hospital's commercial rate commitments over the past five years, whether those commitments were exceeded, and, for each commitment that was exceeded, whether relief was granted by the hospital.

Response: Please see the table below. For the hospitals that are part of the University of Vermont Health Network (UVMC, CVMC and Porter), the numbers do not tie out exactly due the nature of the contracts (where some services are a percentage of billed charges and some services are a negotiated fee schedule) and the nature of the analysis. Additionally, the fee schedule changes are not controlled by MVP, and therefore some difference in the amount of services subject to the different contract types may be applicable.



	GMCB A	GMCB Annual IP+OP Approved Trends			MVP Contracted IP+OP Trends			
Hospital	20 vs. 19	21 vs. 20	22 vs. 21	23 vs. 22	20 vs. 19	21 vs. 20	22 vs. 21	23 vs. 22
Brattleboro Memorial								
Hospital								
Central Vermont Medical								
Center (CVMC)								
Copley Hospital								
Gifford Medical Center								
Grace Cottage Hospital								
Mt. Ascutney Hospital								
North Country Hospital								
Northeast Vermont Regional								
Hospital								
Northwestern Medical								
Center								
Porter Medical Center								
Rutland Regional Medical								
Center								
Southwestern Vermont								
Medical Center								
Springfield Hospital								
University of Vermont								
Medical Center (UVMC)								

If you have any questions or require any additional information, please contact me at ebachner@mvphealthcare.com.

Sincerely,

Eric Bachner, ASA

Director, Commercial Market & Valuation Actuary

MVP Health Care, Inc.